

**FEDERAL PUBLIC DEFENDER**

NORTHERN DISTRICT OF CALIFORNIA  
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**BARRY J. PORTMAN**  
*Federal Public Defender*

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August 9, 2006

The Honorable James Larson  
Chief United States Magistrate Judge  
United States District Court  
for the Northern District of California  
450 Golden Gate Avenue, 15<sup>th</sup> Floor  
San Francisco, California 94102

**BY E-FILING**

Re: United States v. Paolo Cesar Aguilar Rivas  
No. CR 06-00166 JL

United States v. Khahilia Thyjuan Jackson  
No. CR 05-00726 JL

United States v. Ivan Young  
No. CR 05-00054 JL

Your Honor:

I write with respect to the above-named defendants who have been set for judgment and sentencing on August 17, 2006 at 11:00 a.m.

Due to the fact that counsel for the defendants, Elizabeth M. Falk, has been out of the country to take Rule 15 depositions, our office respectfully requests a continuance of the above-referenced sentencings to Friday, September 1, 2006, at 9:30 a.m. This will give counsel additional time prior to sentencing in which to meet with defendants to prepare for sentencing. Derek Owens of the United States Attorney's Office has no objection to our request for continuance, and we have agreed on the date of September 1, 2006 at 9:30 a.m. Our office has informed United States Probation Officers Sara Black, Cheryl Simone, and Insa Bel'Ochi. No officer has any objection to the September 1, 2006 date.

August 9, 2006  
Page 2

Thank you in advance for your consideration. Should your honor grant our request for continuance, we would be pleased to receive a call from your clerk, Mr. Wings Hom, to confirm the continuance. Mr. Hom may contact the secretary to Ms. Falk, Carmen Estrada at 436-7700, who will alert all the parties.

Respectfully submitted,

BARRY J. PORTMAN  
Federal Public Defender

/S/

GEOFFREY A. HANSEN  
Chief Assistant Federal Public Defender

cc: Derek Owens  
Assistant United States Attorney  
(by hand delivery)

Sara Black  
United States Probation Officer  
(by hand delivery)

Insa Bel'Ochi  
United States Probation Officer  
(by facsimile)

Cheryl Simone  
United States Probation Officer  
(by hand delivery)

